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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street  
San Francisco, CA 94105-3901

March 14, 1996

Stanley T. Albright  
Regional Director  
Western Regional Office  
National Park Service  
600 Harrison St., Suite 600  
San Francisco, CA 94107-1375

Dear Mr. Albright:

The Environmental Protection Agency (EPA) Office of Federal Activities has reviewed the **Supplement to Draft General Management Plan and Environmental Impact Statement** for Tumacacori National Historical Park, Arizona. We are submitting the following comments in accordance with our responsibilities under the National Environmental Policy Act (NEPA), Council on Environmental Quality regulations implementing NEPA (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

On October 6, 1993 we commented on the Draft General Management Plan/EIS and gave the DEIS an LO--Lack of Objections rating. In that original document the National Park Service examined three alternatives, including the continuation of existing management practices (no action), to improve resource protection and visitor opportunities at Tumacacori National Historical Park. The alternatives, which are described by planning unit, address management policies for natural and cultural resources, and plans for visitor use facilities, roads and parking, and administrative facilities. This Supplemental DEIS addresses a fourth alternative, where some of those facilities are proposed for construction and development in other areas within the park units. This new fourth alternative is offered as the preferred action alternative. The new preferred alternative is not significantly different in terms of scope and size than the previous preferred alternative.

In many respects the proposed actions in the DEIS and the Supplemental DEIS are stated generally, and the impact assessment for the General Management Plan is correspondingly general. Site specific implementation of measures identified in the Plan (road realignments, closures, facilities designs, and the like) will in many cases depend on subsequent planning. The Plan/EIS does not mention if certain issues which are not covered in this document, will be addressed in more detailed plans and studies. More detailed analysis of impacts on biological resources, air quality, water, and other aspects of the environment would be possible at these later planning stages.

## SUMMARY OF RATING DEFINITIONS AND FOLLOW-UP ACTION

### Environmental Impact of the Action

#### LO-Lack of Objections

The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

#### EC-Environmental Concerns

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

#### EO-Environmental Objections

The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

#### EU-Environmentally Unsatisfactory

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of environmental quality, public health or welfare. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommend for referral to the Council on Environmental Quality (CEQ).

### Adequacy of the Impact Statement

#### Category 1-Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

#### Category 2-Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

#### Category 3-Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\*From: EPA Manual 1640, "Policy and Procedures for the Review of Federal Actions Impacting the Environment."

With the understanding that more specific plans, and appropriate NEPA compliance, will be necessary to implement many of the measures proposed in the General Management Plan, we have rated this Plan/EIS LO-1 (Lack of Objections-- adequate impact documentation; see attached rating sheet). We believe that the Draft Plan/EIS provides promising direction for future management within the three areas of Tumacacori Historical Park. We recommend that the Park Administrator coordinate closely with the proponents of the Juan Bautista de Anza National Historic Trail, since the project is currently in Final EIS development stage.

We appreciate the opportunity to review the Plan/EIS. Please send a copy of the Final EIS to this office when the document is officially submitted to EPA Headquarters. If you have any questions, please call me at 415-744-1584, or contact David J. Carlson at 415-744-1577.

Yours truly,

A handwritten signature in dark ink, appearing to read 'David Farrel', with a stylized flourish extending to the right.

David Farrel, Chief  
Office of Federal Activities

